SORENSEN RESEARCH AND DEVELOPMENT TRUST,  Plaintiff,  Plaintiff,  Vs.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation,  Courtroom: 2, 17th	OURT ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TION PENDING THE IE OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m.
tad.bell@pillsburylaw.com DANIEL J. RICHERT #232208  dainel.richert@pillsburylaw.com 2475 Hanover Street  Palo Alto, CA 94304-1114 Telephone: (650) 233-4500  Facsimile: (650) 233-4545  MCDONNELL BOEHNEN HULBERT & BERGHOFF LLP BRADLEY J. HULBERT hulbert@mbhb.com KURT W. ROHDE rohdek@mbhb.com RICHARD A. MACHONKIN machonkin@mbhb.com 300 South Wacker Drive Chicago, IL 60606-6709 Telephone: (312) 913-0001  Facsimile: (312) 913-0002  Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.  UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA  UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA  Plaintiff, DEVELOPMENT TRUST, NOTICE OF MOT MOTION TO STA Plaintiff, LITIGATION PEN OUTCOME OF RI AMERICA, INC., a Delaware corporation, Judge: Hon. Je  Defendant. Defendant.	OURT ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TION PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
daniel.richert@pillsburylaw.com 2475 Hanover Street Palo Alto, CA 94304-1114 Telephone: (650) 233-4500 Facsimile: (650) 233-4545  MCDONNELL BOEHNEN HULBERT & BERGHOFF LLP BRADLEY J. HULBERT hulbert@mbhb.com KURT W. ROHDE rohdek@mbhb.com 300 South Wacker Drive Chicago, IL. 60606-6709 Telephone: (312) 913-0001 Facsimile: (312) 913-0002  Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.  UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA  NORTHERN DISTRICT OF CALIFORNIA  DEVELOPMENT TRUST, NOTICE OF MOT MOTION TO STA Plaintiff, LITIGATION PER PROCEEDINGS  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, Judge: Hon. Je  Defendant. Defendant. Judge: Hon. Je	OURT ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TION PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
2475 Hanover Street 5 Palo Alto, CA 94304-1114 Telephone: (650) 233-4500 6 Facsimile: (650) 233-4545 7 MCDONNELL BOEHNEN HULBERT & BERGHOFF LLP BRADLEY J. HULBERT hulbert@mbhb.com KURT W. ROHDE rohdek@mbhb.com 300 South Wacker Drive 11 Chicago, IL 60606-6709 Telephone: (312) 913-0001 Facsimile: (312) 913-0002 13 Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC. 14 15 UNITED STATES DISTRICT COURT 16 NORTHERN DISTRICT OF CALIFORNIA 17 18 JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST, NOTICE OF MOT 19 DEVELOPMENT TRUST, NOTICE OF MOT 20 Plaintiff, LITIGATION PEN 21 vs. PROCEEDINGS 22 DIGITAL NETWORKS NORTH Date: January AMERICA, INC., a Delaware corporation, Time: 9:00 a.r 24 Courtroom: 2, 17th Defendant. Dudge: Hon. Je	OURT ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TION PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
Telephone: (650) 233-4500 Facsimile: (650) 233-4545  7 MCDONNELL BOEHNEN HULBERT & BERGHOFF LLP BRADLEY J. HULBERT hulbert@mbhb.com KURT W. ROHDE rohdek@mbhb.com RICHARD A. MACHONKIN machonkin@mbhb.com 300 South Wacker Drive 11 Chicago, IL 60606-6709 Telephone: (312) 913-0001 Facsimile: (312) 913-0002  13 Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.  14 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 17 18 JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND 19 DEVELOPMENT TRUST, 10 NOTICE OF MOT 11 Vs. 12 Plaintiff, 13 LITIGATION PEN 14 OUTCOME OF RI 15 Vs. 16 PROCEEDINGS 17 OUTCOME OF RI 17 AMERICA, INC., a Delaware corporation, 18 JENS ERIK SORENSEN ORTH JOUTCOME OF RI 18 JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND JOUTCOME OF RI 19 OUTCOME OF RI 20 Courtroom: 2, 17th Judge: Hon. Je 21 Defendant. 22 Digital NETWORKS NORTH Judge: Hon. Je	OURT ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TION PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
7 MCDONNELL BOEHNEN HULBERT & BERGHOFF LLP BRADLEY J. HULBERT hulbert@mbhb.com KURT W. ROHDE 9 rohdek@mbhb.com RICHARD A. MACHONKIN machonkin@mbhb.com 300 South Wacker Drive 11 Chicago, IL 60606-6709 Telephone: (312) 913-0001 12 Facsimile: (312) 913-0002 13 Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC. 14 15 UNITED STATES DISTRICT COURT 16 NORTHERN DISTRICT OF CALIFORNIA 17 18 JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND 19 DEVELOPMENT TRUST, 10 NOTICE OF MOT 11 Vs. 12 Plaintiff, 11 LITIGATION PEN 12 OUTCOME OF RI 13 AMERICA, INC., a Delaware corporation, 14 Time: 9:00 a.m. 15 Courtroom: 2, 17th 16 Defendant. 17 Judge: Hon. Je 18 JENS ERIK SORENSEN NORTH 19 Date: January 19 AMERICA, INC., a Delaware corporation, 10 Courtroom: 2, 17th 10 Defendant. 11 Judge: Hon. Je	OURT ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TION PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
BRADLEY J. HULBERT hulbert@mbhb.com KURT W. ROHDE rohdek@mbhb.com RICHARD A. MACHONKIN machonkin@mbhb.com 300 South Wacker Drive Chicago, IL 60606-6709 Telephone: (312) 913-0001 Facsimile: (312) 913-0002  Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  NORTHERN DISTRICT OF CALIFORNIA  JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST,  Plaintiff, UTIGATION PEN OUTCOME OF RI PROCEEDINGS  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, AMERICA, INC., a Delaware corporation, Judge: Hon. Je	OURT ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TION PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
8 hulbert@mbhb.com KURT W. ROHDE 9 rohdek@mbhb.com RICHARD A. MACHONKIN 10 machonkin@mbhb.com 300 South Wacker Drive 11 Chicago, IL 60606-6709 Telephone: (312) 913-0001 12 Facsimile: (312) 913-0002 13 Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC. 14 15 UNITED STATES DISTRICT COURT 16 NORTHERN DISTRICT OF CALIFORNIA 17 18 JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND 19 DEVELOPMENT TRUST, 10 NOTICE OF MOT 10 NOTICE OF MOT 11 NOTICE OF RI 12 Vs. 12 Plaintiff, 13 LITIGATION PEN 14 OUTCOME OF RI 15 PROCEEDINGS 16 OUTCOME OF RI 16 AMERICA, INC., a Delaware corporation, 17 AMERICA, INC., a Delaware corporation, 18 Defendant. 19 Defendant. 10 Defendant. 11 Judge: Hon. Je	ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
rohdek@mbhb.com RICHARD A. MACHONKIN machonkin@mbhb.com 300 South Wacker Drive Chicago, IL 60606-6709 Telephone: (312) 913-0001 Facsimile: (312) 913-0002  Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.  UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA  NORTHERN DISTRICT OF CALIFORNIA  NORTHERN DISTRICT OF CALIFORNIA  Plaintiff, NOTICE OF MOT MOTION TO STA LITIGATION PEN DUTCOME OF RI PROCEEDINGS  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, AMERICA, INC., a Delaware corporation, Defendant.  Defendant.  Documents  Courtroom: 2, 17th Judge: Hon. Je	ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
RICHARD A. MACHONKIN machonkin@mbhb.com 300 South Wacker Drive Chicago, IL 60606-6709 Telephone: (312) 913-0002  Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.  15  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  17  18  JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST, NOTICE OF MOT  19  Plaintiff, NOTICE OF MOT  OUTCOME OF RI  20  Plaintiff, Date: January AMERICA, INC., a Delaware corporation, Time: 9:00 a.r.  21  Defendant. Dudge: Hon. Je	ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
300 South Wacker Drive Chicago, IL 60606-6709 Telephone: (312) 913-0001 12 Facsimile: (312) 913-0002  Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.  14  15  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  17  18  JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST,  Plaintiff,  Plaintiff,  DUTCOME OF RI PROCEEDINGS  22  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, AMERICA, INC., a Delaware corporation, Defendant.  Defendant.  Divide: January Courtroom: 2, 17th Judge: Hon. Je	ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
Telephone: (312) 913-0001 Facsimile: (312) 913-0002  Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST, NOTICE OF MOTOMOTION TO STA DIGITAL NETWORKS NORTH DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, Time: 9:00 a.m. Courtroom: 2, 17th Defendant.  Defendant.  DIGITAL NETWORKS NORTH Defendant.  Defendant.	ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST,  Plaintiff,  Plaintiff,  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation,  AMERICA, INC., a Delaware corporation,  Defendant.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation,  Defendant.  Defendant.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation,  Defendant.  Defendant.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation,  Defendant.  Defendant.  Defendant.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation,  Defendant.  Defendant.	ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
DIGITÁL NETWORKS NORTH AMERICA, INC.  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  DEVELOPMENT TRUST,  Plaintiff,  Plaintiff,  DIGITAL NETWORKS NORTH  AMERICA, INC., a Delaware corporation,  DEVELOPMENT,  DEFENDANCE  DIGITAL NETWORKS NORTH  AMERICA, INC., a Delaware corporation,  Defendant.  DEVELOPMENT TRUST,  DEFENDANCE  DIGITAL NETWORKS NORTH  DEFENDANCE  DIGITAL NET	ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  IN Plaintiff, NOTICE OF MOTO  Plaintiff, NOTICE OF RI  Vs. PROCEEDINGS  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, AMERICA, INC., a Defendant.  Defendant.  UNITED STATES DISTRICT COURT  No. 07 C  No. 07 C  NOTICE OF MOTO  MOTION TO STA  DOUTCOME OF RI  PROCEEDINGS  Courtroom: 2, 17th  Defendant.  Defendant.	ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
NORTHERN DISTRICT OF CALIFORNIA  NO. 07 CONTROL OF MOTOR	ORNIA  No. 07 CV 5568  OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST,  Plaintiff,  Vs.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, Defendant.  Defendant.  NOTICE OF MOT MOTION TO STA LITIGATION PEN OUTCOME OF RI PROCEEDINGS  Courtroom: 2, 17th Judge: Hon. Je	No. 07 CV 5568  OF MOTION AND TO STAY THE TION PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST,  Plaintiff,  Vs.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, Defendant.  Diagnostic process of the process	OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
SORENSEN RESEARCH AND DEVELOPMENT TRUST,  Plaintiff,  Plaintiff,  Vs.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, Defendant.  Defendant.  Defendant.  NOTICE OF MOT MOTION TO STA LITIGATION PEN OUTCOME OF RI PROCEEDINGS  Courtroom: 9:00 a.m. Judge: Hon. Je	OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
SORENSEN RESEARCH AND DEVELOPMENT TRUST,  Plaintiff,  Plaintiff,  Vs.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation, Defendant.  Defendant.  Defendant.  NOTICE OF MOT MOTION TO STA LITIGATION PEN OUTCOME OF RI PROCEEDINGS  Courtroom: 9:00 a.m. Judge: Hon. Je	OF MOTION AND TO STAY THE TON PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
Plaintiff,  Plaintiff,  Plaintiff,  Date: January  AMERICA, INC., a Delaware corporation,  Defendant.  Defendant.  Defendant.  MOTION TO STA  LITIGATION PEN  OUTCOME OF RI  PROCEEDINGS  Courtroom: 2, 17th  Judge: Hon. Je	TO STAY THE TION PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. 1: 2, 17th Floor
Plaintiff, OUTCOME OF RI OUTCOME OF RI PROCEEDINGS  22 DIGITAL NETWORKS NORTH Date: January AMERICA, INC., a Delaware corporation, Courtroom: 2, 17th Defendant. Judge: Hon. Je	TION PENDING THE ME OF REEXAMINATION DINGS  January 18, 2008 9:00 a.m. n: 2, 17th Floor
vs.  DIGITAL NETWORKS NORTH AMERICA, INC., a Delaware corporation,  Defendant.  Defendant.  PROCEEDINGS  Date: January Time: 9:00 a.n Courtroom: 2, 17th Judge: Hon. Je	January 18, 2008 9:00 a.m. n: 2, 17th Floor
AMERICA, INC., a Delaware corporation,  Ourtroom: 2, 17th  Defendant.  Defendant.  Defendant.	9:00 a.m. n: 2, 17th Floor
AMERICA, INC., a Delaware corporation,  Ourtroom: 2, 17th  Defendant.  Defendant.  Defendant.	9:00 a.m. n: 2, 17th Floor
Defendant. ) Judge: Hon. Je	
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1	TO ALL PARTIES AND THEIR COUNSEL OF RECORD:
2	NOTICE IS HEREBY GIVEN that on January 18, 2008 at 9:00 a.m., or as soon
3	thereafter as the matter may be heard by the above-entitled Court, defendant <u>Digital</u>
4	Networks North America, Inc. ("DNNA") will and hereby does respectfully move for a star
5	of the above-captioned proceeding pending the outcome of the ongoing United States
6	Patent & Trademark Office ("PTO") reexamination of the patent in suit, U.S. Patent No.
7	4,935,184 ("the '184 patent").
8	A stay is warranted given the current status of this case. The original Complaint
9	was served on November 12, 2007. An Amended Complaint was filed on November 27,
10	2007. Discovery has not yet begun, no trial date has been set, and the parties have not yet
11	submitted initial Rule 26(a)(1) disclosures. A stay will conserve the resources of both the
12	Court and the parties and will also provide the benefit of simplifying (if not eliminating) the
13	issues for trial. Given that the '184 patent will be expiring in approximately three months
14	and that discovery has not yet begun, Plaintiff Jens Erik Sorensen, as Trustee of Sorensen
15	Research and Development Trust ("Plaintiff" or "Sorensen"), would not be prejudiced in
16	any way by entry of an order staying the present litigation pending the PTO's ongoing
17	reexamination of the '184 patent. Failure to grant a stay may result in prejudice to the
18	Defendant.
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1	For the reasons set forth in greater detail in the Supporting Memorandum of Points			
2	and Authorities and related pleadings submitted herewith, DNNA respectfully requests that			
3	the Court order this case stayed pending completion of the PTO's ongoing reexamination of			
4	the '184 patent.			
5	Dated: December 11, 2007			
6		LLSBURY WINTHROP SHAW PITTMAN LLP		
7	TF	AVID A. JAKOPIN HEODORE K. BELL		
8	24	DANIEL J. RICHERT 2475 Hanover Street Palo Alto, CA 94304-1114		
9				
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11	Бу	Daniel J. Richert		
12		Attorneys for Defendant DIGITAL NETWORKS NORTH AMERICA, INC.		
13	Of Counsel:	INC.		
14	Richard A. Machonkin (admitted pro hac vice)			
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